



Order Filed on July 5, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

22-08369 BKOBJ01
BROCK & SCOTT, PLLC
302 Fellowship Rd, Suite 130
Mount Laurel, NJ 08054
(844) 856-6646
Attorneys for U.S. Bank National Association

In Re:

NAT S AMADEO
DENISE M AMADEO

Case No: 22-13537-CMG

Hearing Date: June 15, 2022

Judge: CHRISTINE M.
GRAVELLE

Chapter: 13

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION

The consent order set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**

DATED:

Honorable Christine M. Gravelle
United States Bankruptcy Judge

DATED: July 5, 2022



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United States Bankruptcy Judge

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Chapter: 13

The Consent Order pertains to the property located at 1162 Sylvan Dr, Toms River, NJ 08753, mortgage account ending with “4042”;

This Matter having been brought before the Court by William H. Oliver, Jr, Esquire, attorney for Debtor(s), Nat S Amadeo and Denise M Amadeo (“Debtors”) upon the filing of a Chapter 13 Plan, U.S. Bank National Association (“Creditor”) by and through its attorneys, Brock and Scott, PPLC, having filed an Objection to the Confirmation of said Chapter 13 Plan and the parties having subsequently resolved their differences; and the Court noting the consent of the parties of the form, substance and entry of the within Order, and for other and good cause shown:

1. The Parties agree that this Consent Order shall be made part of the Confirmation Order.
2. The Debtors agree that they shall cure the full amount of Creditor’s valid secured Proof of Claim (to be filed), which will list pre-petition arrears in the amount of \$164,179.45, through their Chapter 13 Plan.
3. The Debtors agree that they shall cure the arrears described above by completing a Loan Modification, which must occur on or before **November 30, 2022**.
4. The Debtors agree that if they are not able to enter into a Loan Modification by November 30, 2022, they will file a Modified Plan to cure the arrears described above through Chapter 13 plan payments within thirty (30) days.

5. The Debtors agree to make post-petition monthly mortgage payments pending completion of a Loan Modification and acknowledge that the post-petition monthly mortgage payment amount is subject to change in accordance with the terms of the Note and Mortgage.

6. If the Debtors fails to complete a Loan Modification by November 30, 2022 and fail to amend their plan within thirty (30) days to cure the arrears through Chapter 13 Plan payments, or if the Debtors fail to make any post-petition monthly mortgage payment within thirty (30) days of the date it becomes due, then the Creditor may obtain an Order vacating, terminating and/or annulling the Automatic Stay as to the Property by filing, with the Bankruptcy Court, a Certification specifying the Debtors' failure to comply with this Order. At the time the Certification is filed with the court, a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors and Debtors' attorney.

7. If required by the Trustee, Debtors agrees to amend their Chapter 13 Plan post-confirmation to provide for the terms listed above.

8. This Order shall be incorporated in and become a part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,
Content and entry of the within Order:

BROCK AND SCOTT, PLLC
U.S. Bank National Association
By Its Attorney,

/s/ Matthew Fissel
Matthew Fissel
(Bar No. 038152012)
Attorney for Creditor
BROCK & SCOTT, PLLC
8757 Red Oak Blvd.
Suite 150
Charlotte, NC 28217
Telephone: 844-856-6646 x 4535
Facsimile: 704-369-0760
E-Mail: NJBKR@brockandscott.com

Dated: June 15, 2022

DEBTORS
By Their Attorney,

/s/ William H. Oliver, Jr.
William H. Oliver, Jr, Esquire
Attorney for Debtors
Oliver & Legg, LLC,
2240 State Highway 33, Suite 112,
Neptune, NJ 07753
Phone Number: 732-988-1500
Fax: 732-775-7404
Email: courtdocs@oliverandlegg.com

Dated: June 23, 2022